

September 3, 2009

Chair Mary Nichols and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: Proposed Changes to Statewide Truck and Bus Regulation**

Dear Chair Nichols and Board Members:

The undersigned organizations support a strong, health protective regulation for on-road in-use diesel trucks and buses. We appreciate staff's thoroughness in clarifying language from the December 2008 adopted regulation. We believe many of these clarifications have helped to improve the clarity and understanding of the regulation. However, there are a few changes to the regulation that concern us.

**We are concerned by the inclusion of motorcoaches in the NOx exempt category.** We have not benefited from an analysis about the impacts this change will have on clean air efforts across the state. A more fundamental concern is the change in a category after the rule has been adopted and at a stage in the rule-making process where public input is limited. We urge you to reconsider this approach.

**Additionally, we are concerned by the changes to the reporting deadline for agriculture fleets.** The rule adopted in December 2008 required agriculture fleets to report by January 31, 2009. While we did not agree with the special provisions and exemptions afforded to agriculture fleets in the rule adopted in December 2008, we understood the emission reductions analysis would be forthcoming. This analysis would allow us to benefit from a full and accurate accounting of the missed emissions reductions. However, a 15 month delay in reporting will result in an even further delay in the analysis on the missed emission reductions from these vehicles. This is of particular concern in the San Joaquin Valley, Sacramento region and Imperial Valley where agriculture trucks are prevalent and where clean air deadlines are looming. We urge ARB to do all it can to require reporting earlier, so as to ensure accuracy and to allow ARB staff to quantify the missed emissions reductions. As of yet, there is no analysis to show the impact the agriculture special provisions and exemptions will have on our ability to meet regional and state air quality goals.

We intend to continue to ensure successful implementation of this important regulation considering that diesel trucks and buses represent a major source of pollution impacting the lives and lungs of residents across the state. To that end, we greatly appreciate ARB's recent outreach efforts, including the development of the toll free number and Truck Rule Advisory Committee (TRAC), among others. We appreciate the Board's interest in addressing our concerns on the proposed changes.

Sincerely,

Nidia Bautista  
**Coalition for Clean Air**

Anne Kelsey-Lamb  
**Regional Asthma Management and Prevention, and  
Community Action to Fight Asthma**

Don Anair  
**Union of Concerned Scientists**

Joy Williams  
**Environmental Health Coalition**

Karen Goodson Pierce  
**Bayview Hunters Point Health and Assessment Task Force  
Bayview Hunters Point Community Advocates**

Diane Bailey  
**Natural Resources Defense Council**

Sarah Sharpe  
**Fresno Metro Ministry**

Bill Magavern  
**Sierra Club California**

Jocelyn Vivar  
**East Yard Communities for Environmental Justice**

Melissa W. Stephens  
**San Diego Regional Asthma Coalition**

Andy Katz  
**Breathe California**

Bonnie Holmes-Gen  
**American Lung Association**